

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:23-md-3076-KMM

**In re: FTX Cryptocurrency Exchange
Collapse Litigation**

This Document Relates To:

Orr v. Wasserman Media Group, LLC,
No. 1:23-cv-24478-KMM

/

**DEFENDANT WASSERMAN MEDIA GROUP, LLC'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant Wasserman Media Group, LLC (“Wasserman Media”) respectfully requests the Court grant an extension of time for Defendants to respond to Plaintiffs’ Class Action Complaint (the “Complaint”) [No. 23-cv-24478, ECF No. 1], pursuant to Federal Rule of Civil Procedure 6(b)(1)(A). Plaintiffs do not oppose the primary relief sought in the Motion.

On November 27, 2023, Plaintiffs filed the Complaint. Plaintiffs served Wasserman Media on November 30, 2023. On December 7, 2023—on behalf of Wasserman Media—Mr. Stephen Warren of the undersigned law firm emailed counsel for Plaintiffs, Mr. Adam Moskowitz, requesting if Plaintiffs would oppose an extension to January 30, 2024 for Wasserman Media to respond to complaint. Mr. Warren requested the extension to ensure Wasserman Media had sufficient time to engage counsel, review the case, and prepare a response in light of year-end holidays. Mr. Moskowitz responded that Plaintiffs had no objection to the requested extension.

For the foregoing reasons, good cause exists to extend the time for Defendants to respond to the Complaint. Plaintiffs will not be prejudiced by this extension; nor is the extension sought for the purpose of delay.

Wasserman Media thus respectfully request the Court enter an Order extending to at least January 30, 2024 for Wasserman Media to respond to the Complaint. Moreover, in light of Co-Defendant Dentsu McGarry Bowen LLC’s (“Dentsu”) request to extend their time to respond to February 29, 2024 (*see Mot. [ECF No. 428]*), it would be more efficient to synchronize Wasserman Media’s response and briefing schedule with Dentsu’s, subject to Plaintiffs’ objection.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(3)

Mr. Warren of the undersigned law firm conferred via email with Mr. Moskowitz, who stated he does not oppose Wasserman Media’s requested extension to January 30, 2024.

Mr. Warren called Mr. Moskowitz today and left a voicemail requesting whether Plaintiffs would oppose Wasserman Media being on the same response schedule as Dentsu, but Mr. Warren did not receive a response to this request by the time of filing this Motion.

Dated: December 21, 2023.

Respectfully submitted,

Andrew W. Balthazor

Andrew W. Balthazor (Fla. Bar No. 1019544)

Andrew.Balthazor@hklaw.com

Stephen P. Warren (Fla. Bar. No. 788171)

Stephen.Warren@hklaw.com

Holland & Knight LLP

701 Brickell Avenue, Suite 3300

Miami, Florida 33131

Telephone: 305-374-8500

Attorneys for Defendant Wasserman Media